

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

1. HANAN F. ALSOURI,

Plaintiff,

v.

**1. CROSSROADS HOSPICE OF
OKLAHOMA CITY, L.L.C.,**

Defendant.

CASE NO. CIV-15-1228-W

**(Oklahoma County District Court
Case No. CJ-2015-5501)**

NOTICE OF REMOVAL

Defendant Crossroads Hospice of Oklahoma City, L.L.C. (hereinafter referred to as “Defendant”), by and through its undersigned counsel, and pursuant to 28 U.S.C. §§ 1331, 1441 and 1446, hereby removes this matter from the District Court of Oklahoma County, State of Oklahoma, to the United States District Court for the Western District of Oklahoma. In support of this Notice of Removal, Defendant states as follows:

1. On October 8, 2015, Plaintiff Hanan F. Alsouri (“Plaintiff”) filed a Petition in the District Court of Oklahoma County, Case No. CJ-2015-5501. A copy of the Petition is attached hereto as Exhibit 1.

2. Defendant was served with the Summons and Petition on or about October 14, 2015. A copy of the Summons is attached hereto as Exhibit 2. Thus, this Notice of Removal is timely filed within thirty (30) days after Defendant was served with the Summons and Petition, pursuant to 28 U.S.C. § 1446(b).

3. No further process, pleadings or motions have been served and no further proceedings have taken place in this action. A copy of the Entry of Appearance filed by counsel

for Plaintiff is attached hereto as Exhibit 3, and the state court docket sheet is attached hereto as Exhibit 4.

4. Venue is proper under 28 U.S.C. § 1441(a) for all federal claims because the District Court of Oklahoma County, State of Oklahoma, is located within the district for the United States District Court for the Western District of Oklahoma.

JURISDICTION OF THE FEDERAL COURT

Federal Question Jurisdiction

5. Plaintiff's Petition is a civil action over which this Court has original jurisdiction under the provisions of 28 U.S.C. § 1331, in that Plaintiff's Petition contains claims for relief under Title VII of the Civil Rights Act, as amended. Plaintiff's Petition also alleges discrimination in violation of the Oklahoma Anti-Discrimination Act 25 O.S. § 1101, et seq. *See* Petition at ¶ 5. As a civil action founded on a claim or right arising under the laws of the United States, this action is removable to this Court pursuant to 28 U.S.C. § 1441(a).

PROCEDURAL REQUIREMENTS

6. Written notice of the filing of this Notice of Removal will be provided to Plaintiff, together with a copy of the Notice of Removal and supporting papers. Pursuant to 28 U.S.C. § 1446(d), the same will be filed with the Clerk of the District Court of Oklahoma County.

7. Defendant submits this Notice of Removal without waiving any defenses to the claims asserted by Plaintiff, without conceding that Plaintiff has pled claims upon which relief can be granted, without admitting that Plaintiff has standing, and without admitting that Plaintiff is entitled to any monetary or equitable relief whatsoever.

8. This Notice of Removal does not waive any objections to defects in process or service of process, jurisdiction, venue, statute of limitations, exhaustion of administrative remedies, or any other defenses.

WHEREFORE, Defendant, Crossroads Hospice of Oklahoma City, L.L.C., hereby gives notice that the matter styled *Hanan F. Alsouri v. Crossroads Hospice of Oklahoma City, L.L.C.*, filed in the District Court of Oklahoma County, Case No. CJ-2015-5501, is removed to the United States District Court for the Western District of Oklahoma and Defendant respectfully requests that this Court retain jurisdiction for all further proceedings as provided by law.

Respectfully submitted,

s/Michael J. Lissau

Michael J. Lissau, OBA #18098

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**ATTORNEYS FOR DEFENDANT
CROSSROADS HOSPICE OF
OKLAHOMA CITY, L.L.C.**

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of November, 2015, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of Notice of Electronic Filing to the Following ECF registrants:

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s/Michael J. Lissau

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